

Motion for an Order to Show Cause and to Compel Compliance with Rule 45 Subpoena and Court Order of January 25, 2016, which is being filed concurrently herewith.

In accordance with Federal Rule of Civil Procedure 37(a)(1), the undersigned counsel certifies that counsel for Movant Eramo conferred by letter and email with counsel for Respondent “Jackie” prior to the filing of this Motion, that counsel for the Movant made a good faith effort to resolve the discovery matters at issue, and that Movant and Respondent were unable to resolve the issue.

WHEREFORE, Movant Nicole Eramo respectfully requests that the Court grant her Motion for an Order to Show Cause and to Compel Compliance with Rule 45 Subpoena and Court Order of January 25, 2016, order Jackie to comply with the January 25, 2016 Court Order, provide specific and detailed explanations to the extent that Jackie claims that responsive documents are no longer in her possession, custody, or control, and award reasonable attorney’s fees and other costs associated with this motion.

Dated: March 29, 2016

Respectfully submitted,

By: /s/ Thomas A. Clare
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ATTORNEYS FOR PLAINTIFF NICOLE ERAMO

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Nicole Eramo's Motion for an Order to Show Cause and to Compel Compliance with Rule 45 Subpoena and Court Order of January 25, 2016 on March 29, 2016 via ECF (for those attorneys that have registered), or by email and Federal Express (for those attorneys that have not).

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